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May 20, 2025

By email and ECF

The Honorable Ann M. Donnelly
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn New York 11201

Re: United States v. Svetlana Dali, 25 CR 14 (AMD)

Dear Judge Donnelly:

I write, pursuant to Federal Rule of Criminal Procedure 30(a), to request that the Court include the following instruction in the final charge to the jury:

Statements by the Defendant

There has been evidence that the defendant made certain statements after she was arrested in this case.

In deciding what weight to give the defendant's statements, you should examine with great care whether each statement was voluntarily and understandingly made. I instruct you that you are to give the statements such weight as you feel they deserve. In making this decision, you should consider all matters in evidence having to do with the statement, including those concerning Ms. Dali herself and the circumstances under which the statement was made.¹

¹ Adapted from Sand, *Modern Federal Jury Instructions*, Instr. 5-19. See also, 18 U.S.C. § 3501(a); *Third Circuit Model Criminal Jury Instruction* 4.32.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Michael K. Schneider, Esq.

cc: Clerk of the Court (by ECF)
AUSA Brooke Theodora (by ECF and email)